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Attorneys for HLS of Nevada LLC *dba* Nevada West Financial

UNITED STATES BANKRUPTCY COURT  
District of Nevada

In Re

OLIVIA ALVINA BROWN

Debtors.

CASE NO.: BK-S-18-17268-BTB

Chapter 7

**STIPULATION RE: MOTION FOR  
RELIEF FROM STAY**

COMES NOW, HLS of Nevada LLC *dba* Nevada West Financial ("Creditor"), by and through its attorney, Christine A. Roberts, of The Law Offices of Christine A. Roberts PLLC, and Debtor Olivia Alvina Brown in Proper Person and stipulate and agree to payment.

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**STIPULATED FACTS**

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2 1. On or about December 10, 2018, the Debtor filed this Chapter 7 Voluntary Petition  
3 and an order for relief was entered.

4 2. Debtor was previously known as Olivia Alvina Byrd.

5 3. On February 5, 2013 Debtor, Olivia Alvina Byrd aka Olivia Alvina Brown, entered  
6 into a Vehicle Sale Agreement with Nevada West Financial for a 2004 Land Rover Range Rover, Vin  
7 # SALME11424A145298 in the amount of \$14,997.36. (See Exhibit "1", a copy of the agreement).  
8 (See also Declaration of Mathew Kane filed in support of this matter).

9 4. The agreement term commenced on March 22, 2013 and continued until February 22,  
10 2018. According to the contract the Debtor agreed to pay \$435.76 monthly at an annual interest rate  
11 of 24%.

12 5. Debtor has only paid \$750 in the last three years.

13 6. The loan payoff, including interest as of December 13, 2018, was \$18,583.04.

14 7. Debtor is paying her filing fees in installments and the last payment is not due until  
15 April 9, 2019.

16 8. Nevada West Financial filed a motion seeking an order for relief from the automatic  
17 stay to allow Creditor to proceed in a voluntary turnover of the vehicle or a repossession of the  
18 vehicle.

19 9. The parties have now reached an agreement for the amount of payment for the  
20 vehicle.

**SETTLEMENT TERMS**

21  
22 IT IS HEREBY STIPULATED AND AGREED that Debtor shall pay HLS one additional  
23 sum of \$5,000 on or before April 1, 2019;


24 IT IS FURTHER STIPULATED AND AGREED that if Debtor fails to make the  
25 payment timely pursuant to the terms of this stipulation Nevada West Financial may file an ex parte  
26 application for an order for relief from stay allowing Debtor to turnover the vehicle to the Creditor or  
27 allowing the Creditor to repossess the vehicle immediately;

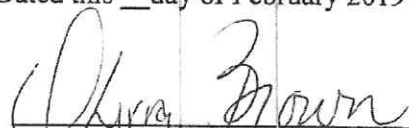
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1 IT IS FURTHER STIPUALTED AND AGREED that Debtor shall maintain insurance on the  
2 vehicle and timely pay any and all registration fees for the vehicle, until she makes the final payment  
3 to HLS .  
4

5 Dated this 15<sup>th</sup> day of February 2019

Dated this \_\_\_ day of February 2019

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Olivia Alvina Brown  
Debtor